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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,
9 Plaintiff,
10 vs.
11 RUSSELL CATES,
12 Defendant.

CASE NO.: 2:20-mj-519-VCF

**RUSSELL CATES' UNOPPOSED
MOTION TO CONDUCT A PRE-PLEA
PRESENTENCING INVESTIGATION
REPORT AND PROPOSED ORDER**

13 COMES NOW the Defendant, RUSSELL CATES, by and through his attorney of record,
14 KAREN A. CONNOLLY, of the law office of KAREN A. CONNOLLY, LTD., and hereby moves
this Honorable Court to order that a Pre-Plea Pre-Sentence Investigation Report be prepared by the
16 United States Department of Parole and Probation to determine Defendant's criminal history.
17 Defendant has a number of priors. Counsel for defendant and Assistant United States Attorney
18 JIM W. FANG, have been engaged in negotiation discussions. Defendant's criminal history score
19 needs to be clarified to enable counsel to properly assess his exposure relative to any proposed plea
20 agreement, specifically whether or not CATES is eligible for a Armed Career Criminal or Career
21 Offender enhancement. In order to help facilitate a resolution to this matter, in the interests of
22 judicial economy, it is respectfully requested that the United States Department of Parole and
23 Probation be directed to prepare a pre-plea presentence investigation report as soon as possible.

24 DATED this 1st day of March, 2021.

25 */s/ Karen A. Connolly*
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28 Attorney for Defendant, Russell Cates

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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 RUSSEL CATES,

13 Defendant.

14 CASE NO.: 2:20-mj-519-VCF

ORDER

15 IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence
16 Investigation Report on Defendant RUSSELL CATES.

17 DATED this the 11th day of March, 2021.

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19
20 
21 U.S. MAGISTRATE JUDGE

KAREN A. CONNOLLY, LTD.
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1 **CERTIFICATE OF SERVICE**

2 It is hereby certified that service of the above and foregoing UNOPPOSED MOTION TO
3 CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT was made through
4 the Court's electronic filing and notice system (CM/ECF) which will send a notice of electronic
5 filing to all parties via electronic filing.

6 Dated this 1st day of March 2021.

7
8 */s/ Shaeley Foster*
9 Employee of Karen A. Connolly, LTD.

KAREN A. CONNOLLY, LTD.

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